

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STEELWORKERS OF
AMERICA, AFL-CIO/CLC,

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Plaintiff,

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CIVIL ACTION NO. 04-12489-WGY

v.

PLIANT CORPORATION,

*
*
*

Defendant.

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MOTION FOR ADMISSION OF ATTORNEY
RICHARD L. MARCUS PRO HAC VICE

NOW COMES Susan G. Fentin, Esq., and moves for the admission of Attorney Richard L. Marcus, pro hac vice in this matter, pursuant to Local Rule 83.5.3(b).

In support of this Motion, the undersigned submits the Affidavit of Attorney Richard L. Marcus, which is attached hereto as Exhibit A. The firm of Skoler, Abbott & Presser, P.C., will remain as local counsel in this matter.

DATED at Springfield, Massachusetts, this 11th day of January 2005.

Respectfully Submitted,

/s/ Susan G. Fentin

Susan G. Fentin, Esq.

BBO No. 632962

Counsel for Defendant

Skoler, Abbott & Presser, P.C.

One Monarch Place, Suite 2000

Springfield, Massachusetts 01144

Tel.: (413) 737-4753/Fax: (413) 787-1941

Dated: January 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above document was served upon Plaintiff's counsel, Warren H. Pyle and Nicole Horberg Decter, Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., 18 Tremont Street, Suite 500, Boston, MA 02108, by first-class, U.S. mail, postage prepaid on January 11, 2005.

/s/ Susan G. Fentin
Susan G. Fentin, Esq.

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STEELWORKERS OF)
AMERICA, AFL-CIO/CLC,)
)
 Plaintiff,) CIVIL ACTION NO. 04-12489-WGY
 v.)
)
)
 PLIANT CORPORATION,)
)
 Defendant.)

**AFFIDAVIT OF RICHARD L. MARCUS IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, RICHARD L. MARCUS, having been duly sworn, do hereby state:

1. My residence is 1073 Skokie Ridge Drive, Glencoe, Illinois.
2. My principal office is at Sonnenschein, Nath & Rosenthal, 8000 Sears Tower, Chicago, Illinois 60606.
3. I have been admitted to practice in the state courts of Illinois since 1962.
4. I have been admitted to practice in the Untied States District Court for the Northern District of Illinois since 1963.
5. I am admitted to practice in the United States Courts of Appeal for the First Circuit (since 1966), the Second Circuit (since 1988), the Sixth Circuit (since 1976), the Seventh Circuit (since 1963) and the District of Columbia Circuit (since 1967).
6. I am not subject to disciplinary action in any jurisdiction, and am a member in good standing of the bar.

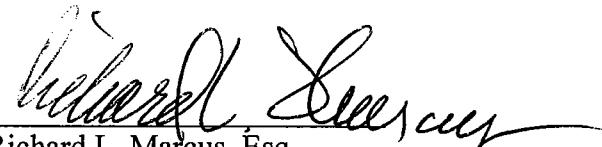
7. Neither I nor any member of the firm to which I belong has been denied admission to any court or disciplined in accordance with Local Rule 83.6 of the United States District Court for the District of Massachusetts.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

9. I and my firm represent the Defendant in a case involving alleged violation of the Worker Adjustment and Retraining Notification Act, 29 U.S.C. § 2101, et. seq.

I swear that the above is true.

Respectfully submitted,



Richard L. Marcus, Esq.
Sonnenschein, Nath & Rosenthal
8000 Sears Tower
Chicago, IL 60606
Telephone: (312) 876-8000
Fax: (312) 876-7934

Dated: January 10, 2005

Sworn to and Subscribed to me before
This 10th day of January, 2005.



Notary Public
My Commission Expires: 4/20/06



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